

Section 9-250 of the Act for competitive interexchange and exchange services. However, nothing in CUB's complaint provides a legal or factual basis for such an investigation.

32. The legal standard applicable to the rate aspects of CUB's complaint provides the Commission with the discretion to dismiss it as well. This Commission has previously dismissed at least two other actions alleging that Ameritech Illinois' rates were not "just and reasonable," without engaging in evidentiary hearings. In Docket 86-0224, for example, the complainants argued that the Commission should examine Ameritech Illinois' rates, based on allegations that the Company was making too much money under the rates then in effect. The Commission dismissed the action, noting that the Commission had only recently approved the challenged rates and finding, based on the affidavits presented both by the complainants and by Ameritech Illinois, that the complainants had "not presented sufficient evidence to warrant the Commission to exercise its discretion" to investigate those rates. Order in Docket 86-0224, adopted April 15, 1987, pp. 6-7.

33. The Commission also granted the Company's motion to dismiss a complaint regarding its rates in Utility Users League v. Illinois Bell Telephone Co., Docket No. 47555, 43 P.U.R. 3d 38 (Nov. 29, 1961). As the Commission observed in that decision, the Commission's power to dismiss a complaint regarding a utility's rates is a logical extension of the filed rate doctrine (which requires that approved rates be

viewed as just and reasonable) and the Commission's general discretion and power of oversight over utility rates (which reflect the legislature's delegation of rate matters to the expertise of the Commission). As the Commission found, "it must be borne in mind that formal rate investigations of large utilities such as this company are time-consuming and expensive..." Id. at 42. Thus, the Commission may, in its discretion, refuse to proceed with such an investigation:

"The commission is not just an umpire. It has been given active functions of policy making and supervision. It may initiate hearings on its own motion, and it has a wide discretion in shaping proceedings brought by others. The act provides that rates shall be reasonable; but it entrusts the enforcement of that obligation in the first instance to the commission." Ibid.

As a part of its active role, the Commission has the power to determine whether an investigation is necessary to resolve a complaint, or whether the complaint may be dismissed on the pleadings. Id., quoting Antioch Milling Co. v. Public Service Co., 4 Ill. 2d 200, 209-10 (1954); see also Chesterfield-Medora Telephone Co., supra, 37 Ill. 2d at 327-28; Illini Coach Co., supra, 408 Ill. at 114.⁴

34. Most of Ameritech Illinois' payphone rate increase and rate restructuring actions which CUB complains about were

⁴ In Utility Users League, the Commission had approved the rates at issue some eight years prior to a consumer group's complaint. However, despite that passage of time, the Commission dismissed the complaint without hearings, ruling that a formal investigation was unnecessary. The Commission based its decision on its general power to determine whether circumstances warrant an investigation of a utility's rates. Utility Users League, 42 P.U.R. 3d at 39, 41, 43. It should be noted that the Commission construed the complaint at issue as a petition for an investigation pursuant to what is now Section 9-250 of the Act. That Section, like Section 10-113, is addressed to the Commission's discretion. Id. at 42-43.

approved in the Commission's Payphone Complaint Order. Therefore, both principles of administrative finality, and the filed rate doctrine preclude CUB from relitigating these rate actions. With respect to additional rate changes effected by the Company beyond what were expressly approved in Docket 88-0412, CUB has failed to justify the requested investigation. Because CUB's complaint does not clearly distinguish between these two categories of rate changes, Appendix A attached hereto provides a concise summary.

A. Payphone Rate Levels

35. The principal basis for CUB's contention that Ameritech Illinois' payphone rate levels are unjust and unreasonable is a "survey" of payphone rates charged by Bell operating companies nationwide. Based on that survey, CUB contends that Ameritech Illinois' rates for a local payphone call are significantly higher than what is typical in other states.⁵ (CUB Complaint, pp. 18-20). CUB also contends that the rates for local calls in other Ameritech operating companies' service territories are lower. (CUB Complaint, p. 21).

36. The first ground for dismissal is that the rate comparisons on which CUB relies are legally irrelevant unless CUB shows that surrounding circumstances are also comparable. Antioch Milling Co. v. Public Service Co. of Northern Illinois, 4 Ill. 2d 200, 210-11 (1954); Moline Consumers Co. v. Commerce Comm'n, 353 Ill. 119, 126 (1933). In fact, just

⁵ Ameritech Illinois has not attempted to replicate this survey and does not know whether it is accurate.

the opposite is true. The regulatory requirements faced by Ameritech Illinois relative to its payphone service are unique. Under the Illinois Public Utilities Act, competitive service rates must pass three separate cost tests:

- long run service incremental costs (Section 13-502(c));
- imputation (Section 13-505.1); and
- the aggregate revenue test (Section 13-507).

Under the LRSIC test, payphone rates must be higher than the long run service incremental costs which Ameritech Illinois incurs to provide payphone service. Under the imputation test, Ameritech Illinois must "impute" to its payphone rates, as a part of the cost floor, the tariff rates for "noncompetitive services or service elements" which non-LEC payphone providers must obtain from the Company (e.g. payphone access lines, usage, directory assistance and so forth). This test protects competitors from a "price squeeze." Under the aggregate revenue test, the Company must apportion all of its common costs and "residual" costs that are not captured in LRSIC studies between the competitive and noncompetitive service categories; and competitive service rates must, as a matter of law, cover this cost assignment, in addition to the other LRSIC and imputed costs directly attributable to the provision of payphone and other competitive services. This test protects noncompetitive ratepayers from "cross subsidy" as defined by the General Assembly.

37. Much of the litigation in Docket 88-0412 involved how these cost tests should be applied to payphone service. The Payphone Association took the position that a \$36 - \$64 million rate increase was required for payphone service to satisfy them; Ameritech Illinois contended that only a \$9.6 - \$17.5 million increase was required. Payphone Complaint Order, supra, p. 20. The final stipulation agreed to by the parties and accepted by the Commission was \$27 million. Ibid. There was no question, however, that significant rate increases were required to price payphone service appropriately.

38. The payphone rate comparisons provided by CUB are meaningless because, to Ameritech Illinois' knowledge, no telephone company in any other state has similar pricing obligations. CUB does not allege otherwise. In fact, it is common knowledge in the industry that many states treat payphone service as a "benefitted" or "subsidized" service. Payphone services in those states would not even pass a LRSIC test, much less the equivalent of the Illinois imputation and aggregate revenue tests. Therefore, CUB's rate comparisons principally demonstrate that payphone services nationwide are underpriced, not that Ameritech Illinois' are overpriced.

39. Furthermore, this practice of subsidizing payphone rates will come to an end shortly. In the Telecommunications Act of 1996, Congress explicitly prohibited the subsidization of payphone service by either local exchange or carrier access services:

"Section 276(a). NONDISCRIMINATION SAFEGUARDS.- After the effective date of the rules prescribed pursuant to subsection (b), any Bell operating company that provides payphone service - (1) shall not subsidize its payphone service directly or indirectly from its telephone exchange service operations or its exchange access operations; and (2) shall not prefer or discriminate in favor of its payphone service".

The FCC must issue rules implementing this section of the Act in November of 1996. Ameritech Illinois, at this point, assumes that its payphone rates will satisfy the new federal standard, since the LRSIC, imputation and aggregate revenue tests required by the Public Utilities Act are intended to prohibit precisely the kind of subsidy practices that are now prohibited by federal law. However, the Company expects that there will be significant increases in the payphone rates charged by many of the other Bell operating companies once these states come into compliance with Section 276(a).⁶ It is Ameritech Illinois' expectation that any disparities between the Company's rates and those in other states will largely disappear at that time, thus removing the basis for CUB's allegation that Ameritech Illinois' payphone rates are too high. Accordingly, even if the rate comparisons provided by CUB were legally relevant -- which they are not -- they have no probative value at this time, given the changes taking place in the industry.

⁶ Of course, at this time, it is difficult to predict how any individual state will interpret the cross-subsidy prohibition in the federal Act. Unless a state adopts the equivalent of the LRSIC, imputation and aggregate revenue tests required in Illinois, no valid comparisons can be made between their rates and Ameritech Illinois' even after implementation of Section 276(a) of the federal Act.

40. Furthermore, since all payphone services in Ameritech Illinois' service territory are competitive, any analysis of the reasonableness of Ameritech Illinois' rates should properly be based in the first instance on a market analysis relative to other competitive providers in Illinois. CUB has provided no evidence whatsoever relative to the prices charged by other payphone vendors in this state. In fact, CUB did not even mention the other payphone providers in this state. Absent information that demonstrates that Ameritech Illinois' rates are excessive relative to Illinois market levels, CUB has failed to present any valid basis for pursuing a rate complaint against Ameritech Illinois alone.

41. A second, and independent, ground for dismissal is that most of the rate activity about which CUB complains was approved in Docket 88-0412. The Payphone Complaint Order clearly authorized a rate filing that would increase rates by at least \$16.5 million and restructure payphone rates to be more usage-sensitive (i.e. by adding a per-minute charging element for all payphone calls). Payphone Complaint Order, supra, pp. 20-21, 22-23. These changes were effectuated in filings effective April 18, 1995, and July 31, 1995, in which the initial drop rate was increased from \$.25 from \$.35 and in which the rates were restructured to include a 1-minute overtime period. (See Attachment A).⁷ Thus, any complaint

⁷ This filing preceded the Commission's order in Docket 88-0412 because the Company decided to declare the service competitive under the Act in March, prior to a formal decision on the complaint. At that point, the likely outcome of the proceeding was clear. Therefore, the Commission had before it the Company's implementation filing in advance of deciding the Payphone Complaint Order.

made by CUB relative to the \$16.5 million rate increase and these rate restructurings is barred by considerations of collateral estoppel and the filed rate doctrine. See cases cited supra; Antioch Milling, supra.⁸

42. CUB implies that the net revenue effect of the April 18, 1995 payphone rate restructuring exceeded \$16.5 million. (CUB Complaint, pp. 30-31). This is not true. (See attached affidavit of Larry G. Parker).

43. The only other payphone rate change effectuated by the Company took place in October and November of 1995. At that time, the one-minute overtime period was increased to five minutes. This restructuring was performed on a revenue-neutral basis. (See attached affidavit of Larry G. Parker). Therefore, there was no rate impact on customers overall and it is irrelevant to the issue of the Company's overall payphone rate levels.

44. The Company further notes that noncompetitive ratepayers were fully insulated from the effects of the April and July payphone rate changes. In Docket 95-0182 (Ameritech Illinois' 1995 Annual Rate Filing under its Alternative

⁸ CUB claims that there is no "reliable evidence" to support the \$16.5 million increase because it was stipulated to by the parties. (CUB Complaint, p. 30). CUB ignores the fact that the Commission carefully reviewed the stipulated amount in light of the "extensive documented testimony and positions of the parties" and "agreed" that the stipulated aggregate revenue test shortfall was "supported by the record." Payphone Complaint Order, supra, p. 20. If CUB wanted to contest that finding, it was incumbent on it to participate in Docket 88-0412 and present its position to the Commission in a timely manner. CUB cannot wait 13 months to object. See also Order in Docket 95-0182, adopted June 21, 1995, pp. 9-10 (CUB's failure to challenge a rate compliance filing until 6 months after the entry of the Commission's order justified no further action on issues CUB raised relative to that filing).

Regulation Plan), Ameritech Illinois was ordered to reduce noncompetitive rates by \$16.5 million to correspond to the \$16.5 million payphone rate increase required to pass the aggregate revenue test. See Order in Docket 95-0182, *supra*, p. 5.⁹ If the \$16.5 million payphone rate increase were rolled back, as CUB suggests, noncompetitive rates would have to increase accordingly. Nowhere does CUB acknowledge this effect of its proposal.

B. Rate Structure

45. CUB contends that Ameritech Illinois should not be permitted to reflect distance and duration in its payphone rates and that such a rate structure is inherently "unjust and unreasonable". (CUB Complaint, pp. 22-23). To support that contention, CUB contends that Bell operating companies in most other major cities do not have similarly usage-sensitive rate structures. (CUB Complaint, pp. 22-23). CUB also claims that a charge that reflects call duration violates Section 13-302 of the Public Utilities Act. (CUB Complaint, p. 24). 46. CUB's position reflects its long standing and public animosity to usage-sensitive rates.¹⁰

⁹ Under the Alternative Regulation Plan, only competitive service rate increases required to satisfy the aggregate revenue test must be offset by noncompetitive service rate decreases. Order in Docket 92-0448/93-0239, adopted October 11, 1994, p. 63.

¹⁰ Usage sensitive rate structures typically reflect four different dimensions of call costs:

- frequency (i.e. a separate charge for each call)
- distance (i.e. higher rates for calls that traverse longer distances)
- duration (i.e. higher rates for longer calls)
- time-of-day (i.e. discounts for off-peak calling)

See, e.g., Order in Docket 89-0033 (Remand), adopted November 4, 1991, p. 111. Since payphone calls by necessity must be charged for on a per-call basis, CUB is reduced to arguing over distance and duration.

This Commission has a similarly long-standing and public policy supporting usage-sensitive rates. For example, in 1989, CUB opposed Ameritech Illinois' proposal to extend its MSA-1 usage-sensitive rate structure for residence and business calling to the areas it serves in other Illinois MSAs on a mandatory basis. The Commission categorically rejected CUB's position, finding that usage-sensitive pricing promotes "economic efficiency in the use of telecommunications services," "customer equity" and "economically efficient competition in the intramSA marketplace." Order in Docket 89-0038 (Remand), adopted November 4, 1991, at p. 130. Consistent with its general pro-measured service position, in Docket 88-0412 the Commission expressly approved the restructure of Ameritech Illinois' payphone rates to be more usage-sensitive: "Adjusting the local coin rates to measured usage reflects this Commission's policy of cost-based rates which has moved other end users to measured usage..." Payphone Complaint Order, supra, p. 23. Thus, CUB's general opposition to the use of distance and duration in the Company's payphone rate structure is inconsistent with the plain terms of the Payphone Complaint Order, is contrary to established Commission policy and cannot be the basis for this proceeding.

46. CUB's more particularized complaint about the length of the overtime period (i.e. 5 minutes) does not rise to the level of a rate issue that should be investigated in

this case. (CUB Complaint, pp. 23-24). The decision whether to make the additional period 2 minutes (New York), 3 minutes (Philadelphia) or 5 minutes (Ameritech Illinois) is fundamentally a matter of carrier discretion when designing its rates. (CUB Complaint, p. 19). There is no "right" answer and the mere fact that other companies have made different decisions does not present a legal basis for challenging Ameritech Illinois'. Moreover, carriers must be accorded an even greater degree of pricing latitude where, as here, the service is competitive.

47. In any event, this change to a 5-minute overtime period was made to be responsive to customers. Ameritech Illinois received numerous objections from customers about the one-minute additional period, complaining that one-minute interruptions for additional coin deposits were annoying and disruptive. (See attached affidavit of Larry G. Parker). The fact that any given call may last less than the 5 minute additional increment does not make it unlawful. (CUB Complaint, p. 23). That is inherent in any rate structure that charges in increments.¹¹ Moreover, as discussed previously, since the change from one-minute to five-minute

¹¹ It is interesting to note that CUB's position on this issue is fundamentally inconsistent with its policy preference for flat rate local exchange service. For example, if residence customers pay a flat rate for an access line and all usage, those customers which make very few outgoing calls are, in CUB's terms, paying for an "essential service" that "may not be utilized and from which the end-user derives no benefit." (CUB Complaint, p. 23). However, in that context, CUB finds a flat rate structure entirely acceptable.

It should also be noted that this duration charge affects only a small portion of payphone calls overall. Approximately 70% of Ameritech Illinois' payphone calls are 3 minutes or less. (See attached affidavit of Larry G. Parker).

overtime increments was made on a revenue neutral basis, it had no overall financial effect on customers.

48. CUB's contention that this rate structure violates Section 13-302 of the Act is wrong as a matter of law. Section 13-302 is applicable to "local measured service calling plans" offered to individual subscribers and requires that "residential customers" have certain options available to them in terms of a flat rate or untimed area. Payphone rates are not a residential "local measured service calling plan" within the meaning of the statute. Payphone rates are entirely separate from either business or residence rates.¹² Furthermore, in the Payphone Complaint Order, the Commission approved the principle that the payphone rate structure should mirror the business rate structure under which Ameritech Illinois charges its payphone competitors:

"Furthermore, Illinois Bell will restructure its coin rates to match the network usage bands currently being charged to competing payphone providers. The Illinois Bell payphone coin zone for local will be adjusted to mirror the current Band A network usage area charged to competing payphone providers... Illinois Bell's end user call rates shall go to a measured usage rate of three minutes for the initial deposit and an additional charge for each addition minute." Payphone Complaint Order, supra, p. 23. (emphasis added).

¹² Payphone rates are set forth in a separate part of Ameritech Illinois' tariff from either the residence or business calling rates. (Ill. C.C. No. 19, Part 13, Section 1, administrative notice requested). In fact, calls from payphones can be either personal or business in nature. Ameritech Illinois would be unable to distinguish between the two for billing purposes.

Accordingly, CUB's position is at odds with both the law and the Commission's prior orders and should be disregarded.¹³

III. AN AMERITECH ILLINOIS - SPECIFIC PROCEEDING

49. Finally, CUB's attempt to address Ameritech Illinois' payphone rates in isolation is improper. If the Commission wishes to investigate Ameritech Illinois' payphone rates in Illinois -- and Ameritech Illinois believes that it should not for all of the reasons stated previously -- then the investigation should be conducted as a rulemaking and should encompass all payphone providers. In a competitive marketplace, regulatory pricing rules must be developed and applied in an even-handed manner so as not to advantage or disadvantage any particular provider. For example, if Ameritech Illinois -- and only Ameritech Illinois -- were subject to rate caps on its payphone service, the Company would be less able to compete with non-LEC payphone providers for profitable locations where commissions are paid to premises owners as a percentage of revenue volumes generated by the payphone. The greater degree of rate freedom accorded by the competitive service classification in the Public Utilities Act was clearly intended to result in a more level-playing field between incumbents and new entrants. Industry-

¹³ CUB claims that the overtime charge should not be uniform, regardless of the distance of the call. (CUB Complaint, pp. 24-25). CUB has its economics confused. The distance component of Ameritech Illinois' payphone rate structure addresses changes in cost based on the geographical location of the calling and called parties. (See CUB Complaint, p. 17 for distance rate structure and discussion on pp. 22-23). The duration component addresses changes in cost based on the length of the call. There is no logic to CUB's view that duration costs should also vary as a function of distance. They are entirely separate cost factors.

wide pricing rules are required to maintain that equivalent treatment.¹⁴

50. In addition, any decision on the rates which Ameritech Illinois can charge will have a profound impact on the economic viability of its competitors. CUB's recommendation that Ameritech Illinois' payphone rates be set so that the Company earns either "no profit, or a minimal amount of profit" is a throwback to the days when Ameritech Illinois was the "monopoly" provider of service and payphone rates were intentionally set as low as possible. (CUB Complaint, p. 27). The Commission recognized in Docket 88-0412 that such a pricing approach is flatly inconsistent with a competitive marketplace. If Ameritech Illinois' payphone rates are set below market rates at levels that produce little or no profit and if non-LEC payphone providers' costs are similar to Ameritech Illinois', there will be no competition. Competitors cannot survive in that environment. Given these implications, an industry-wide proceeding is essential from a policy perspective as well.

51. CUB claims that special regulatory restrictions -- beyond what would be appropriate for competitive services generally -- should be applied to payphone service because it

¹⁴ The Commission's treatment of competitive operator services rates provides the most relevant comparison. There, in response to concerns about excessive charges by Alternative Operator Services ("AOS") providers, the Commission initiated a rulemaking and adopted rate caps that were applicable to all providers. 83 Ill. Admin. Code §770. "Just and reasonable rates" were defined in terms of a range around the rates of the principal provider of operator services -- in that case, AT&T.

has been classified as "essential" by the General Assembly in Section 13-215 of the Act. (CUB Complaint, pp. 26-27). Section 13-215 of the Act has nothing whatsoever to do with the issues raised by CUB. Section 13-215 was added to the Public Utilities Act in 1988 together with Sections 13-214, 13-703, 13-705, 13-706 and 13-707 as part of P.A. 85-1405 which generally addressed the needs of the hearing-impaired.¹⁵ Payphones designated as "essential" under Section 13-215 and manufactured after July 1, 1989, must be hearing-aid compatible under Section 13-706. This requirement is directly solely at the payphone equipment. It has nothing to do with how payphone service ought to be priced, classified or treated for regulatory purposes.

52. However, even if CUB were correct -- which it is not -- this "essential service" theory further dictates an industry-wide proceeding. If Ameritech Illinois' payphones provide "essential" services so as to require unique regulatory treatment, then so do the payphones provided by non-LEC payphone providers. Any pricing rules designed to address this allegedly "essential" quality of payphone service logically must be applied to the entire industry. Accordingly, if CUB is permitted to proceed, this complaint should still be dismissed and CUB should be limited to refiling a petition for rulemaking seeking payphone industry-wide relief.

¹⁵ Some of these sections were subsequently amended by P.A. 85-1404 and 86-1278.

IV. CONCLUSION

53. There is no legal, policy or factual basis that supports CUB's complaint in this proceeding. It can and should be dismissed as an improper attempt to relitigate issues that were decided based on a full record in Docket 88-0412. Furthermore, the positions taken by CUB are fundamentally contrary to well-established Commission rate and regulatory policies and the payphone policies set forth in the Payphone Complaint Order and now in the federal Act. In effect, CUB is asking this Commission to micromanage the Company's pricing decisions in a competitive marketplace -- a policy direction which this Commission has not followed in the past and should not adopt now. Accordingly, CUB has failed to sustain its burden to justify going forward and this complaint should be dismissed.

WHEREFORE, in view of the foregoing, the Verified Complaint filed by the Citizens Utility Board should be dismissed.

Respectfully submitted

ILLINOIS BELL TELEPHONE COMPANY



One of its Attorneys

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Appendix A

SUMMARY OF RATE CHANGESTariff FilingEffective Date

1. Rate Increase and Rate Restructure

April 18, 1995

- increase drop rate from \$.25 to \$.35
- restructure of payphone Zones A, B and C to match business usage Bands A, B and C
- implementation of one-minute overtime period for payphone Zones B and C calls

2. Rate Restructure

July 31, 1995

- implementation of one-minute overtime period for payphone Zone A calls

3. Rate Restructure

October 27, 1995

- implementation of five-minute overtime period for payphone Zone A calls

4. Rate Restructure

November 6, 1995

- implementation of five-minute overtime period for payphone Zones B and C calls

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

CITIZENS UTILITY BOARD)	
Complainant)	
)	
v.)	
)	
ILLINOIS BELL TELEPHONE COMPANY)	Docket 96-0346
Respondent)	
)	
Complaint for an investigation)	
regarding the proper service)	
classification of Illinois Bell)	
Telephone Company's payphone)	
services and for the establishment)	
of just and reasonable payphone)	
rates.)	

AFFIDAVIT OF LARRY G. PARKER

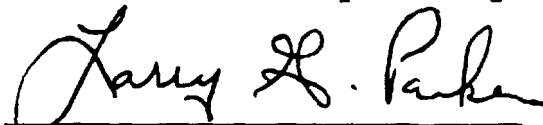
Larry G. Parker, being duly sworn, does affirm and state as follows:

1. That he is a Director - Regulatory Affairs for Ameritech Illinois, and is responsible for regulatory matters which involve its payphone operations;
2. That the information set forth in Appendix A is true and correct.
3. That the actual, net revenue effect of the rate increase and rate restructures effective on April 18, 1995 and July 31, 1995, did not exceed \$16.5 million.
4. That the rate restructures effective on October 27, 1995 and November 6, 1995, were implemented on a revenue neutral basis.
5. That customers complained to Ameritech Illinois that the interruptions required to obtain additional coin

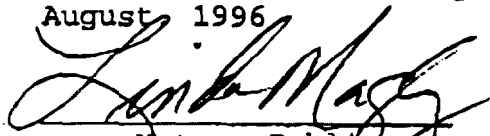
deposits under the one-minute overtime period rate structure were annoying and disruptive.

6. That approximately 70% of the Ameritech Illinois' payphone calls are 3 minutes or less.

Further Affiant sayeth naught


Larry G. Parker

Subscribed and sworn to
before me this 21st day of
August 1996


Notary Public



STATE OF ILLINOIS

)

COUNTY OF COOK

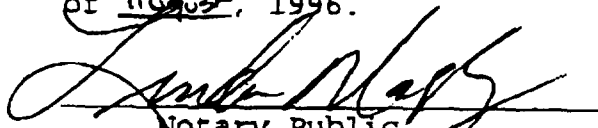
)

VERIFICATION

Louise A. Sunderland, being first duly sworn, states on oath that she is an attorney for Ameritech Illinois and that the facts stated in the foregoing Motion to Dismiss are true and correct to the best of her knowledge, information and belief.


Louise A. Sunderland


Subscribed and sworn to
before me this 21st day
of August, 1996.


Notary Public



CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Motion to Dismiss of Illinois Bell Telephone Company was served upon the Service List via facsimile and overnight delivery this 21st day of August, 1996.


Louise A. Sunderland

SERVICE LIST

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AMERITECH INFORMATION INDUSTRY SERVICES PROFITMASTER NEWS!

June 1996

Your Ameritech ProfitMaster™ Information Source

LET'S TALK ABOUT YOUR PLANS...

Ameritech Information Industry Services is very interested in discussing any targeted sales and market opportunities for ProfitMaster, regardless of location in the Ameritech region.

For example, think about one of your large targeted accounts where ProfitMaster might give you the extra leverage to make the sale. Even though AIIS may not offer ProfitMaster there now, with the added volume your account could bring (and input that we are receiving from other Independent Payphone Providers), getting ProfitMaster service to that area may be possible. Please call Bruce Beckman, your IPP Account Manager at (800) 200-0710 to discuss the opportunities.



ADDITIONAL TECHNICAL SUPPORT PROVIDED BY INTELICALL

Intellicall has hired a former Ameritech employee, Al Dikszas, to support the ProfitMaster platform in Illinois full time. Al has a tremendous background and extensive knowledge of Ameritech's switches and will be a great asset to the team. Dave Brezinski, manager - technology development, Network Services, who worked with Al when he was an Ameritech employee, is enthusiastic about Al's support of this project.

Al's initial responsibilities with Intellicall will be to monitor the INPs (Intelligent Network Platforms) that reside in the central offices. He also will perform preventive maintenance activities to minimize future hardware problems on the platform.

NEW OFFICE AVAILABILITY

The Irving office in the 312 area code will offer ProfitMaster service in the following NXXs beginning July 3, 1996:

267 463 478 509 539 583 588 604 730 866 961

The Waukegan office in the 847 area code will offer ProfitMaster service in the following NXXs beginning July 26, 1996:

244 249 263 336 360 623 625 662

Don't forget that the Lafayette office in the 312 area code began offering ProfitMaster in May. Again, those NXXs are:

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HELPFUL HINTS

Accuracy of Area Codes/NXXs is Critical

With all the recent and pending area code changes, it is very important that you verify that the area code in your ANILST agrees with the current area code for each ANI listed in your coin totals. For example, if the actual area code for a specific number shown in the coin totals is 847, you need 847 in your ANILST, not 708. Also, to avoid problems, be careful that you haven't transposed any digits of a number, especially in the NXX, in your ANILST.

You may need to suspect a faulty electronic coin mech if...

when using an electronic coin mechanism, the coins keep dropping through after the installation of a new line. This has occurred with a couple of our customers who determined that they had a bad electronic coin mech.

What to check for if your coin totals for a phone have not changed from the previous day:

- What is the date and time of the last coin call on your CDR? If the last coin call was on the previous day, you may have an equipment problem.
- Was there an alarm for that phone indicating a coin jam or a coinbox threshold level 3?

When can you start preprogramming a new line?

If the ANI for the new ProfitMaster line appears in your current coin total file, the system is ready for preprogramming of the line.

How to prevent 1+ Dial Around:

- In your special numbers table, add 10XXX1. Select the option "Block" from the list of options.

What helpful hints do you have that we can share in our next newsletter?

What topics would you like to see covered in the next issue of our newsletter?

Call Ann Westcott at (800) 824-9421 or Linda Karaba at (414) 523-7118 with your input.

We want this newsletter to meet your needs, as well as to keep you informed!

